



Public Schools of North Carolina

Title I Part A Your Winning Ticket to Comparability

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What is Comparability?

An LEA may receive Title I Part A funds only if it uses State and local funds to provide services in Title I schools that are “comparable” to services provided in non-Title I schools. Comparability is one indication that an LEA is using Title I funds to supplement and not supplant other funding sources. A local education agency must determine comparability annually in order to receive Title I Part A funds [*Section 1120A*].



Maintenance of Effort (MOE)

Each LEA must –

- Maintain fiscal effort with State and local funds;
- Provide services in its Title I schools with State and local funds that are at least comparable to services provided in its non-Title I schools; and
- Use Part A funds to supplement, not supplant regular non-Federal funds. [Section 9521]



Comparability Criteria

Each LEA must establish a written process that identifies:

- The timeline for demonstrating comparability;
- The LEA office responsible for making comparability calculations;
- The measure and process used to determine which schools are comparable;
- The LEA office responsible for written assurances; and
- How and when adjustments are made in schools that are not comparable.



Comparability Assurances

An LEA is required to submit a written assurance that it has established and implemented:

- A district-wide salary schedule;
- A policy to ensure equivalence among schools in teachers, administrators, and other staff; and
- A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

[Section 1120A(c)(2)(A)]



Meeting Comparability Requirements

- LEAs must conduct calculations annually to demonstrate compliance.
- LEAs must keep comparability documentation on file for external review.
- LEAs must prove to be comparable or funds for the upcoming year will not be released.



Measures to Determine Compliance

➤ **Comparing Student/Full-Time Equivalent (FTE) Teacher Ratios**

Comparability is achieved when the student/FTE teacher ratios in the Title I schools do not exceed 110% of the average for non-Title I comparison schools. Instructional staff includes personnel who provide direct instruction or services that support instruction.

➤ **Comparing Student/Teacher Salary Ratios**

Comparability is achieved when the average per pupil State and local expenditure in Title I schools is at least 90% of the average in non-Title I comparison schools.

➤ **Comparing State and Local Per-Pupil Expenditure Ratios**

Comparability is achieved by first demonstrating the amount of State and local funds allocated per child enrolled in each school for the purchase of instructional staff and materials. The LEA then compares per-child amount for each school to determine a range that is between 90 and 110% of the district-wide average.



Methodologies to Meet Comparability

Student/Instructional Staff (FTE) Ratio

Title I schools and non-Title I schools are compared.

Large and small Title I and non-Title I elementary schools are compared.

All schools are Title I schools and different grade spans are compared.

All elementary schools in the LEA are Title I and large and small schools are compared.

All elementary schools in the LEA are Title I schools; high poverty schools are compared and low poverty schools are compared.

All elementary schools in the LEA are Title I schools and each high-poverty school is compared to a limited comparison group consisting of low-poverty schools.



Examples of Ways to Meet Comparability

Comparing State and Local Per-Pupil Expenditure Ratios

All schools in the LEA are Title I schools and the LEA uses per-pupil amount of State and local funds allocated to pay instructional staff salaries as well as State and local funds used to purchase materials and supplies.

All schools in the LEA are Title I schools, different grade spans are compared, and the district uses the per-pupil amount of State and local funds allocated in schools in each grade span. Federal funded positions must be excluded. Vacant positions cannot be included.



State and Local Expenditures and Exclusions

- Per Pupil expenditures must include both State and local funds used for instructional staff salaries as well as State and local funds used for materials and supplies.
- An LEA may exclude State and local funds expended for:
 - Language instruction educational programs;
 - State and local costs of providing services to children with disabilities; and
 - Excess State and local supplemental programs that meet the intent and purpose of Title I, Part A.



Comparability Exclusions

- Federally funded positions
- Staff not providing direct instruction such as a school nurse
- Paraprofessionals
- Administration
- Resources paid with federal funds or private funds



Comparability Timeline

2015-2016

August

Obtain preliminary information from appropriate LEA staff.
Identify LEA Title I and non-Title I schools.

September

Identify data collection methods and timeline for gathering data needed to complete calculations.

October

Collect comparability snapshot data.
Meet with appropriate staff and calculate comparability.

November

Address any outstanding issues with appropriate staff.

December

Provide comparability report to NC DPI through CCIP.



Comparability Planning 2016-2017

January - April

Discuss LEA budget, both State and local funds, concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring compliance with Title I comparability requirements for the upcoming school year.

May - July

Meet with appropriate LEA representatives to discuss the requirements for completing the annual comparability calculations.
Determine roles and responsibilities.
Establish timelines for completion of calculations.
Determine calculation methodology that will be used.



Exemptions for Comparability

- Schools with 100 or fewer students
- An LEA with only one school for each grade span
- A school with no comparison school in the same grade span grouping by enrollment size



Comparability Information

NC DPI Federal Programs Division

<http://www.ncpublicschools.org/program-monitoring>

USED Title I – Comparability

<http://www2.ed.gov/programs/titleiparta/fiscalguid.pdf>

